

**IN THE UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF NORTH CAROLINA
WINSTON-SALEM DIVISION**

FEDERAL TRADE COMMISSION,
et al.

Plaintiffs,

v.

SYNGENTA CROP PROTECTION., et
al.

Defendants.

Case No. 1:22-cv-828

**DEFENDANT CORTEVA, INC.’S
MOTION TO FILE UNDER SEAL
PORTIONS OF ITS MEMORANDUM
IN SUPPORT OF MOTION TO
DISMISS THE COMPLAINT**

Pursuant to Local Rule 5.4(b)(2), Defendant Corteva, Inc. (“Corteva”) respectfully moves this Court to file under seal the confidential portions of its Memorandum in Support of its Motion to Dismiss the Complaint in this matter (the “Memorandum”). Pursuant to Local Rule 5.4(c)(3), Corteva submits the accompanying Brief in Support of Corteva’s Motion to File Under Seal.

The information in the Complaint that Corteva requests be permanently sealed include the terms of Corteva’s discount programs with non-party distributors and information about Corteva’s business decisions, strategies, and plans.

Dated: December 12, 2022

Respectfully submitted,

/s/ Mark E. Anderson

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83.1(d).

Attorneys for Defendant Corteva, Inc.

CERTIFICATE OF SERVICE

I hereby certify that on this 12th day of December, 2022, I caused the foregoing MOTION TO DISMISS COMPLAINT PURSUANT TO FED. R. CIV. P 12(b)(6), and all attachments thereto, to be filed electronically with the Clerk of Court via the Court's CM/ECF system. Counsel for all parties in this case are registered CM/ECF users and will be served by the CM/ECF System.

This the 12th day of December, 2022.

MCGUIREWOODS LLP

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